



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278

August 13, 2024

**BY ECF**

The Honorable John G. Koeltl  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

Application granted. SO ORDERED.

Dated August 14, 2024  
New York, New York

/s/ John G. Koeltl  
John G. Koeltl, U.S.D.J.

**Re: *United States v. Christopher Scott*, 23 Cr. 611 (JGK)**

Dear Judge Koeltl:

The Government respectfully writes to request a four-day extension of the time by which it had to respond to the defendant's motion to dismiss the Indictment (the "Motion").<sup>1</sup> (Dkt. 31).

On May 15, 2024, the Court ordered that the defendant file any motions by July 15, 2024, the Government file a response to any motions by July 26, 2024, and any reply be filed on August 2, 2024. (Dkt. 28). On July 11, 2024, the defendant filed a letter motion, with consent of the Government, requesting an extension of the time to file defense motions from July 15 to July 26, 2024. (Dkt. 29). Attached to the defendant's letter motion was a proposed scheduling order, which set a deadline for defense motions of July 26, 2024, a deadline for the Government's response of August 5, 2024, and a deadline for the defendant's reply of August 12, 2024. (Dkt. 29-1). The Court so ordered the defendant's letter motion on July 12, 2024 ("July 12 Order"). (Dkt. 30). Defendant filed the Motion on July 26, 2024. (Dkt. 31).

Based on the Court's July 12 Order, extending the time for the defendant to file his motions from July 15, 2024 to July 26, 2024, and Local Criminal Rule 49.1, the Government mistakenly believed that it had fourteen days from the date that the Motion was filed to respond. Accordingly, the Government believed that its response to the Motion was due on August 9, 2024 and prepared its response papers to be filed on that date. However, the Government was informed on August 9, 2024 by defense counsel that, according to the proposed scheduling order that was attached to the defendant's request for an extension, which the Government had not seen due to an oversight, the Government's response was due on August 5, 2024. (Dkt. 29-1). After being informed by defense counsel, the Government promptly filed its response to the Motion on August 9, 2024. (Dkt. 32).

<sup>1</sup> The Government requested this extension in its opposition to the Motion, which was filed on August 9, 2024. (Dkt. 32 at 2 n.1.). However, to ensure that the Government is in compliance with Individual Practice Rule I(E), the Government is also filing this request as a letter motion.

In light of the above, the Government respectfully requests a four-day extension of time by which it had to file its response brief from August 5, 2024 to August 9, 2024. The Government also respectfully requests that, in light of this extension, the defendant's reply be due on August 16, 2024.

I have conferred with Michael Bradley, Esq., counsel for Christopher Scott, and he does not oppose the Government's request for an extension.

Respectfully submitted,

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Southern District of New York

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cc: Michael Bradley, Esq. (via ECF)